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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

ESVIN FERNANDO ARREDONDO  
RODRIGUEZ INDIVIDUALLY AND  
A.F.A.J., A MINOR, BY HER  
GUARDIAN AD LITEM, JEFFREY  
HAMILTON

## Plaintiffs,

V.

UNITED STATES OF AMERICA,  
Defendant.

No. CV 22-02845-JLS-AFM

**DEFENDANT'S SUPPLEMENTAL  
MEMORANDUM IN OPPOSITION TO  
PLAINTIFF'S MOTION FOR  
DOCUMENT PRODUCTION AND  
ENTRY OF PROTECTIVE ORDER**

Hon. Alexander F. MacKinnon  
Hearing Date: April 11, 2023  
Hearing Time: 10:00 a.m.

1 Since the filing of Plaintiffs' Motion to Compel on March 15, 2023, through  
2 Defendant's diligent efforts, Defendant has been able to resolve some of the technical  
3 limitations as to the Common Discovery and is prepared to produce almost the entirety  
4 of the Common Discovery upon the entry of Defendant's proposed protective order.

5 Plaintiffs' allegations about the Motion for Sanctions pending in *A.P.F. v. United*  
6 *States*, No. 20-00065-PHX-SRB (D. Ariz. Dec. 14, 2022), ECF No. 328 do not have any  
7 bearing on Defendant's proposed protective order in this case. First, Plaintiffs do not  
8 point to any relevant language in these pending filings in *A.P.F.* related to the  
9 substantive language at issue in Defendant's proposed protective order. Second,  
10 Defendant's proposed protective order in this case is not identical to the protective order  
11 in *A.P.F.* Plaintiffs ignore the fact that the parties substantially met and conferred on the  
12 terms of Defendant's proposed protective order and limited the issues down to three.

13 Plaintiffs have repeatedly asserted their urgency to obtain this Common Discovery  
14 yet want to unravel the extensive negotiations in *A.P.F.* and *C.M.* that have taken place  
15 to streamline the discovery process. If the Court's model protective order is entered,  
16 Defendant will have to re-review those approximately 60,000 pages of documents to add  
17 annotations before production, which would delay the production of the Common  
18 Discovery.

19 Accordingly, Defendant respectfully requests that this Court enter Defendant's  
20 proposed protective order so that discovery can commence in this case without delay.  
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4 Dated: March 28, 2023

Respectfully submitted,

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